

19. Brooks has notified Bell Atlantic well in advance of its plans to provide service to new, large customers and has expressed concerns that without the appropriate actions taken by Bell Atlantic there would be insufficient network capacity to support increased customer growth. Attached to this Complaint as Exhibits 3 and 4, respectively, are a letter from Robert Poulton to John Griffin dated November 10, 1997, and minutes of a meeting between Brooks and Bell Atlantic, dated April 30, 1997, which memorialize Brooks' concerns that Bell Atlantic ensure adequate capacity for anticipated customers. Bell Atlantic (then NYNEX) itself recognized the importance of its providing timely and sufficient interconnection trunking to Brooks. In a letter of May 14, 1997 to Brooks Vice President Rob Shanahan, Thomas M. Dreyer, NYNEX's Director of Local Carrier Sales, wrote:

Unforecasted growth for interconnection trunking in the local network is presenting a new set of challenges to NYNEX as well as your company.<sup>1</sup> Very often these challenges result in service affecting issues impacting the level of service provided to the end users. We at NYNEX are designing a process improvement initiative to address this issue...

As set forth above, however, the "issue" has not been adequately "addressed" at all.

20. In response to network problems that Brooks was experiencing, Brooks requested that written procedures be established that outline the steps the

---

<sup>1</sup> The "growth" of Brooks' need "for interconnection trunking in the local network," as should be clear from paragraph 18, above, was not "unforecasted" by Brooks. Brooks provided timely and adequate growth forecasts to NYNEX in the form requested, i.e., on a computer spreadsheet furnished to it by NYNEX on diskette.

companies would follow in order to trouble-shoot network problems. See, e.g., **Exhibit 4** at paragraph 3; Letter with attachment from Robert Poulton to Bob Fox of Bell Atlantic, dated May 16, 1997, attached to this Complaint as **Exhibit 5**.

21. Brooks also has requested that the companies share access to their respective network data in order to monitor and evaluate traffic on each other's network to prevent blockage from happening in the future. See, e.g., **Attachment 4** at paragraph 4; Letter to Bob Fox dated May 8, 1997, a true and accurate copy of which is attached to this Complaint as **Exhibit 6**.

22. Brooks has repeatedly asked Bell Atlantic to finalize a network grooming plan. Bell Atlantic has been reluctant to meet with Brooks and is reluctant to adopt a final network grooming plan. A properly designed network grooming plan is critical to developing an efficient network of networks and would provide standards to ensure that interconnection trunk groups provided by Bell Atlantic to Brooks experience a grade of service, availability and quality which is comparable to that achieved on interoffice trunks within Bell Atlantic's network and in accord with all relevant industry standards for quality, reliability and availability. Attached to this Complaint as **Exhibits 7** and **8**, respectively, are copies of a letter from Brooks to Bell Atlantic requesting a meeting to finalize network grooming and a Brooks agenda for the items that should be included in such a plan.

23. Brooks has requested that Bell Atlantic provide Brooks with alternate routing as a contingency in the event that trunks reach capacity. Bell Atlantic has not been willing to make such alternate routing arrangements for Brooks.

24. Brooks has placed numerous orders for additional outgoing trunks to handle increased traffic from Brooks customers to Bell Atlantic's customers. Under the Interconnection Agreement, Bell Atlantic is supposed to install corresponding incoming trunks to Brooks. However, since May of 1997, Bell Atlantic has not provided Brooks with a firm order commitment date (FOC) for installing new outgoing trunks and has been very slow to install incoming trunks to Brooks.

25. In response to Brooks' repeated request for additional trunks, Bell Atlantic initially stated that there were no available switch hooks to install at its Washington Street end-office that would permit new trunks to serve Brooks' switch. Subsequently, Bell Atlantic found hooks that would permit additional trunks to serve Brooks' switch. However, Bell Atlantic has still not provided sufficient trunking capacity to handle Brooks' actual and forecasted traffic.

26. On or about May 27, 1997, Brooks sent a letter to Bell Atlantic that described many of the network grievances that are described in this Complaint,

supported by documentation. A copy of that letter and supporting documentation was filed with the Commission.

27. Following the filing of that letter, Brooks met with Bell Atlantic in the hope that its service quality problems with Bell Atlantic could be worked out. In that meeting, Bell Atlantic agreed that it would regularly turn up a number of trunks on a monthly basis to account for the growth in traffic between the companies. Bell Atlantic also agreed to provide an engineering estimated completion date ("EECD") for facilities that are at capacity and that Brooks would be able to use EECDs for planning purposes. Finally, Bell Atlantic created an 800 number for network problems and agreed to provide a contact list and escalation list to trouble shoot inter-network service quality problems. See, meeting minutes for meeting between Bell Atlantic and Brooks, dated May 30, 1997, attached to this Complaint as **Exhibit 9**.

28. Notwithstanding Bell Atlantic's promises, Bell Atlantic has not regularly turned up trunks on a monthly basis since May 1997 and Brooks has never received an EECD. Brooks received a contact list, but Bell Atlantic has still not established effective standard operating procedures for dealing with network problems experienced by CLECs. Brooks called the 800 number for inter-network trouble reports but the Bell Atlantic person answering the call had little knowledge of networking. Brooks is treated in this respect as an end-user and not a peer local exchange carrier.

29. Unfortunately, the network blockage problems experienced by Brooks' customers have continued. In June of 1997, a serious routing problem in Bell Atlantic's tandem switch restricted the number of available trunks from Bell Atlantic to Brooks, resulting in network blockage for all Brooks' customers. Attached to this Complaint as **Exhibit 10** is a copy of a letter from Robert Poulton to John Griffin describing this problem. The trunking problems complained of above have continued to the present day.

30. Brooks has lost customers as a result of Bell Atlantic's poor service in providing sufficient trunking to handle Brooks' traffic and its lack of commitment to solving network disruptions. Attached to this Complaint as **Exhibit 11** are copies of letters relating to customer complaints and cancellations as a result of the network blockage caused by Bell Atlantic.

31. Bell Atlantic's failure to increase network capacity and/or otherwise configure its network to provide alternative routing for increased Brooks traffic (traffic that was reflected in Brooks' forecasts to Bell Atlantic); its failure to plan for and install additional trunks as requested by Brooks; its failure to provide Brooks with firm order commitments for such trunking orders; its failure to manage and upgrade its own network, its failure to cooperate with Brooks to resolve network disruptions, and its failure to work with Brooks to finalize a joint

grooming plan have resulted in severe constraints on Brooks' ability to serve its customers and has caused Brooks to lose customers.

32. Certain Brooks customers who have experienced difficulties calling out or receiving incoming calls have canceled service with Brooks and returned to Bell Atlantic only to find out that they will be charged installation fees. As a result of Bell Atlantic's failure to provide adequate trunks, Brooks customers, who have terminated Brooks' service and returned to Bell Atlantic, have asked Brooks to reimburse them for such fees; Brooks has acquiesced to those requests for reimbursement because it understands the customers' frustrations.

### **COUNT I**

#### **BELL ATLANTIC HAS BREACHED ITS OBLIGATIONS UNDER THE INTERCONNECTION AGREEMENT**

33. Brooks repeats and realleges paragraphs 1 through 34 of this Complaint.

34. Bell Atlantic's failure to expand its trunking capacity in order to take into account Brooks' anticipated customer growth is a violation of Bell Atlantic's duty under the Interconnection Agreement to "install and maintain a reliable network" to "work cooperatively to apply sound network management controls to alleviate congestion," and its duties with respect to the "administration and maintenance of trunk groups. See, Interconnection Agreement at 4.41, 4.42, 8.1 and 8.2.

35. Bell Atlantic's failure to meet with Brooks to finalize a network grooming plan is a violation of Sections 8.1 and 8.2 of the Interconnection Agreement. Bell Atlantic's failure to provide network service quality reports is a violation of Section 8.2 of the Interconnection Agreement. Brooks believes that if such quality service reports were made available they would reveal that Bell Atlantic is not providing Brooks with a network grade of service that Bell Atlantic provides itself.

36. Bell Atlantic's failure to perform its duties under the Interconnection Agreement have caused Brooks to lose customers and pay installation fees charged by Bell Atlantic.

## **COUNT 2**

### **BELL ATLANTIC'S SERVICE QUALITY PERFORMANCE TO BROOKS IS UNJUST, INSUFFICIENT, UNREASONABLE AND DISCRIMINATORY UNDER RHODE ISLAND LAW**

37. Brooks repeats and realleges paragraphs 1 through 36 of this Complaint.

38. Section 39-4-10 of the Rhode Island General Laws vests Commission with jurisdiction over Bell Atlantic's provision of unreasonable and inadequate services to Brooks and provides as follows:

**Orders as to unreasonable practices or inadequate services.** – If, upon a hearing and investigation had under the provisions of this chapter, the division of public utilities and carriers shall find that any regulation, measurement, practice, act, or service or any public utility is unjust, unreasonable, insufficient, preferential, unjustly discriminatory, or otherwise in violation of any of the provisions of chapters 1 to 5, inclusive, of this title, or that any service of any such public utility is inadequate or that any service which can be reasonably demanded cannot be obtained, the division shall have power to substitute therefor such other regulations, measurements, practices, service, or acts, and to make such order respecting, and such changes in the regulations, measurements, practices, service, or acts, as shall be just and reasonable, and the power to order refunds as provide for in Section 39-3-13.1.

39. For reasons set forth above, Bell Atlantic's provision of interconnection trunks to Brooks is unjust, unreasonable, and insufficient.

40. Bell Atlantic's provision of interconnection trunks to Brooks is discriminatory. Bell Atlantic is required to provide Brooks with interconnection trunk groups that have a grade of service, availability and quality comparable to that achieved on inter-office trunks within its own network. Bell Atlantic has not provided the data to demonstrate whether this parity exists.<sup>2</sup>

41. Bell Atlantic's provision of interconnection trunks is inadequate and is a service which has been reasonably demanded but which cannot be obtained by Brooks.

---

<sup>2</sup> It should be noted that the FCC's conditions to the Bell Atlantic - NYNEX merger were designed to address issues of network parity by requiring Bell Atlantic to make performance reports relating to its network services. Bell Atlantic is not satisfying the merger conditions.



COUNT 3

BELL ATLANTIC'S FAILURE TO PROVIDE BROOKS WITH ADEQUATE  
TRUNKING FACILITIES, WHILE PROVIDING THEM TO ITSELF, VIOLATES  
FEDERAL LAW.

42. Brooks repeats and realleges paragraphs 1 through 41 of this Complaint.

43. Section 251(c)(2) of the Telecommunications Act of 1996 provides that the incumbent local exchange carrier has the following duty with respect to interconnection:

(2) INTERCONNECTION. – The duty to provide for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network...

(D) on rates, terms, and conditions that are just, reasonable and non-discriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252.

(emphasis supplied)

44. Under the FCC's Final Rules, 47 CFR Sec. 51.305, Interconnection,

(a) An incumbent LEC shall provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the incumbent LEC's network...

(3) that is at a level of quality that is equal to that which the incumbent LEC provides itself, a subsidiary, an affiliate, or any other party, except as provided in paragraph (4) of this section. At a minimum, this requires an incumbent LEC to design interconnection facilities to meet the same technical criteria and service standards that are used within the incumbent LEC's network. This obligation is not limited to a consideration of service quality as perceived by end users, and includes, but is not limited to, service quality as perceived by the requesting telecommunications carrier;

- (4) that, if so requested by a telecommunications carrier and to the extent technically feasible, is superior in quality to that provided by the incumbent LEC to itself or to any subsidiary, affiliate, or any other party to which the incumbent LEC provides interconnection. Nothing in this section prohibits an incumbent LEC from providing interconnection that is lesser in quality at the sole request of the requesting telecommunications carrier; and,
- (5) on terms and conditions that are just, reasonable and nondiscriminatory in accordance with the terms and conditions of any agreement, the requirements of sections 251 and 252 of the Act, and the Commission's rules including, but not limited to, offering such terms and conditions equally to all requesting telecommunications carriers, and offering such terms and conditions that are no less favorable than the terms and conditions the incumbent LEC provides such interconnection to itself. This includes, but is not limited to, the time within which the incumbent LEC provides such interconnection.

45. Bell Atlantic's failure and refusal to provide adequate and timely trunking to Brooks violates the above referenced statute and Regulation.

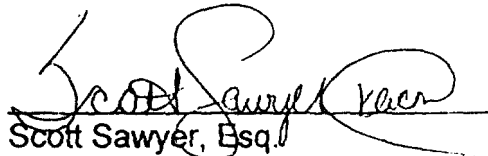
#### V. RELIEF REQUESTED

WHEREFORE, Brooks respectfully requests that the Commission require Bell Atlantic to file a prompt response to this complaint; that it speedily conduct a hearing thereon; and that after such hearing it order Bell Atlantic to:

1. Immediately implement a network solution;
2. Immediately install whatever hooks are available;
3. Implement other network solutions, including translation and routing changes to alternative carriers at no expense to Brooks;
4. Provide Brooks with real time access to Bell Atlantic's network statistical data so that the parties can work and plan together to avoid network congestion and address network disruptions in the future;

5. Cease and desist from charging installation fees to customers who have left Brooks as a result of insufficient trunking;
6. Provide Brooks with refunds for fees paid by Brooks in accordance with RI GL, 39-3-13.1;
7. Reimburse Brooks for payments made on behalf of customers who switched back to Bell Atlantic;
8. Work with Brooks to finalize and implement a network grooming plan by a date certain;
9. Provide monthly reports to the Commission regarding the above requirements; and
10. Such other relief to which the Commission finds Brooks is entitled.

Respectfully Submitted,  
Brooks Fiber Communications of Rhode Island  
By its Counsel;

A handwritten signature in black ink, appearing to read "Scott Sawyer", is written over a horizontal line.

Scott Sawyer, Esq.  
Director of Regulatory Affairs  
Brooks Fiber Communications  
of Rhode Island, Inc.  
One Providence Washington Plaza  
Providence, RI 02903  
Tel. (401) 854-1150  
FAX (401) 854-1177

Robert Glass, Esq.  
11 Vincent St.  
Cambridge, MA 02140  
Tel. & FAX (617) 491-7350

Dated: December 4, 1997

**SCHEDULE 8.2    NYNEX Intervals for Installation****Service Order Standard Intervals**

	<b><u>Number of DS1 Systems</u></b>	<b><u>Standard Interval (Business Days)</u></b>
<b>Establishment of New Trunk Groups</b>		
	1-10	60
	over 10	negotiated
<b>Additions to Existent Trunk Groups</b>		
	1-4	30
	over 4	negotiated

## Exhibit 2

- a. Forecast provided in August 1996.
- b. Forecast provided in May 1997;
- c. Forecast provided in October 1997;
- d. Forecast provided in November 1997.

Lata \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT												1278	1065
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1					
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1					
	MF 2W	PRVDRI003GT		500	60	500	500	60	500	1					
	SS7 2W	PRVDRI003GT		2680	60	2680	2680	60	2680	4					
	SS7 1W I	PRVDRI003GT		0	0	12900	12900	0	0	10					
	SS7 1W O	PRVDRI003GT		12900	100	0	0	100	12900	10	1		12 inst		
ALT PROV	SS7	NWHNCT0304W	XX	XX	XX	XX	XX	XX		1					
ALT PROV	SS7	WTRBCT0002W	XX	XX	XX	XX	XX	XX		1					
ALT PROV	1W I	HWHNCT02B1I		0	0	1000	1000	0	0	2					
ALT PROV	1W O	HWHNCT02B1I		1000	100	0	0	100	1000	2	1		12 inst		

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc Clec to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc Clec to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRI003GT		PRVDRI003GT	XX	100	XX	XX	XX	XX	1							51120 42600
911	PRVDRI003GT	XX		100	XX	XX	XX	XX	1							
911	PRVDRI003GT	XX		100	XX	XX	XX	XX	1							
MF 2W	PRVDRI003GT	7390	60	7390	7390	60	7390	10								
SS7 2W	PRVDRI003GT	9670	60	9670	9670	60	9670	10								
SS7 1WI	PRVDRI003GT	0	0	80740	80740	0	0	63								
SS7 1WO	PRVDRI003GT	80740	100	0	0	100	80740	63		6			24 inst			
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX	1							
ALT PROV	SS7	WTRBCT0002W	XX	XX	XX	XX	XX	XX	1							
ALT PROV	1WI	HWHNCT02B1I	0	0	7670	7670	0	0	7							
ALT PROV	1WO	HWHNCT02B1I	7670	100	0	0	100	7670	7	1			24 inst			

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc Clec to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc Clec to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRI003GT		PRVDRI003GT														3834 3195
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1						
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1						
MF 2W		PRVDRI003GT	550		60	550	550	60	550	2						
SS7 2W		PRVDRI003GT	3070		60	3070	3070	60	3070	5						
SS7 1W I		PRVDRI003GT	0		0	25830	25830	0	0	20						
SS7 1W O		PRVDRI003GT	25830		100	0	0	100	25830	20	2				24 inst	
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX	XX	1						
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX	XX	1						
ALT PROV	1W I	HWHNCT02B11	0		0	1500	1500	0	0	2						
ALT PROV	1W O	HWHNCT02B11	1500		100	0	0	100	1500	2	1				24 ist	



2Q97

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company Brooks Fiber Properties

Clec Forecast for the period (QYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc Clec to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc Clec to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpl DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRI003GT		PRVDRI003GT	XX	100	XX	XX	XX	XX		1					7668	6390
911		PRVDRI003GT	XX	100	XX	XX	XX	XX		1						
MF 2W		PRVDRI003GT	845	60	845	845	60	845		3						
SS7 2W		PRVDRI003GT	3450	60	3450	3450	60	3450		5						
SS7 1W I		PRVDRI003GT	0	0	28330	28330	0	0		22						
SS7 1W		PRVDRI003GT	28330	100	0	0	100	28330		22	2			24 inst		
ALT Prov	SS7	NWHNCT0304W	XX	XX	XX	XX	XX	XX		1						
ALT Prov	SS7	WTRBCT0002W	XX	XX	XX	XX	XX	XX		1						
ALT Prov	1W I	HWHNCT02B1t	0	0	2000	2000	0	0		2						
ALT Prov	1W0	HWHNCT02B1t	2000	100	0	0	100	2000		2	1			24 inst		

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT														
	911	PRVDRI003GT	XX	100	XX	XX	XX	XX		1						
	911	PRVDRI003GT	XX	100	XX	XX	XX	XX		1						
	MF 2W	PRVDRI003GT	1200	60	1200	1200	60	1200		2						
	SS7 2W	PRVDRI003GT	3840	60	3840	60	60	3840		6						
	SS7 1W I	PRVDRI003GT	0	0	30665	30665	0	0		24						
	SS7 1W O	PRVDRI003GT	30665	100	0	0	100	30665		24	2			24 inst		
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX		1						
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX		1						
ALT PROV	1W I	HWHNCT02B1I	0	0	1200	1200	0	0		3						
ALT PROV	1W O	HWHNCT02B1I	1200	100	0	0	100	1200		3	1			24 inst		

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem	Minutes of use EO Orig	Percent Tfc to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT														
	911	PRVDRI003GT	XX	100	XX	XX	XX	XX	1							
	911	PRVDRI003GT	XX	100	XX	XX	XX	XX	1							
	MF 2W	PRVDRI003GT	1560	60	1560	1560	60	1560	3							
	SS7 2W	PRVDRI003GT	4230	60	4230	4230	60	4230	3							
	SS7 1W I	PRVDRI003GT	0	0	33600	33600	0	0	27							
	SS7 1W O	PRVDRI003GT	33600	100	0	0	100	33600	27	3			24 inst			
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX	1							
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX	1							
ALT PROV	1W I	HWHNCT02B1t	0	0	2605	2605	0	0	3							
ALT PROV	1W O	HWHNCT02B1t	2605	100	0	0	100	2605	3	1			24 inst			

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc to NYNEX	Clec EO	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Clec EO	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT															21981	18318
	911	PRVDRI003GT	XX		100	XX	XX	XX	XX	XX	1							
	911	PRVDRI003GT	XX		100	XX	XX	XX	XX	XX	1							
	MF 2W	PRVDRI003GT	1920		60	1920	1920	60	1920	3								
	SS7 2W	PRVDRI003GT	4610		60	4610	4610	60	4610	7								
	SS7 1W I	PRVDRI003GT	0		0	36800	36800	0	0	29								
	SS7 1W O	PRVDRI003GT	36800		100	0	0	100	36800	29	3				24 inst			
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX	XX	1								
ALT PROV	SS7	WTRBCT0002W	XX	XX	XX	XX	XX	XX	XX	1								
ALT PROV	1W I	HWHNCT02B1t	0		0	2800	2800	0	0	3								
ALT PROV	1W0	HWHNCT02B1t	2800		100	0	0	100	2800	3	1				24 inst			

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT														
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1						
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1						
	MF 2W	PRVDRI003GT	2310	60	2310	2310	60	2310		4						
	SS7 2W	PRVDRI003GT	5000	60	5000	5000	60	5000		7						
	SS7 1W I	PRVDRI003GT	0	0	40000	40000	0	0		32						
	SS7 1W O	PRVDRI003GT	40000	100	0	0	100	40000		32	3				24 inst	
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX		1						
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX		1						
ALT PROV	1W I	HWHNCT02B1I	0	0	3010	3010	0	0		3						
ALT PROV	1W O	HWHNCT02B1I	3010	100	0	0	100	3010		3	1				24 inst	

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT														
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1						
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX		1						
	MF 2W	PRVDRI003GT	2680		60	2680	2680	60	2680	4						
	SS7 2W	PRVDRI003GT	5400		60	5400	5400	60	5400	8						
	SS7 1W I	PRVDRI003GT	0		0	44000	44000	0	0	35						
	SS7 1W O	PRVDRI003GT	44000		100	0	0	100	44000	35	3			24 inst		
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX	XX	1						
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX	XX	1						
ALT PROV	1W I	HWHNCT02B11	0		0	3215	3215	0	0	3						
ALT PROV	1W0	HWHNCT02B11	3215		100	0	0	100	3215	3	1			24 inst		

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc Clec to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc Clec to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpl DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT														
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX								
	911	PRVDRI003GT	XX		100 XX	XX	XX	XX								
	MF 2W	PRVDRI003GT	3070		60	3070	3070	60	3070							
	SS7 2W	PRVDRI003GT	5800		60	5860	5860	60	5860							
	SS7 1W I	PRVDRI003GT	0		0	48000	48000	0	0							
	SS7 1W O	PRVDRI003GT	48000		100	0	0	100	48000							
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX								
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX								
ALT PROV	1W I	HWHNCT02B11	0		0	3430	3430	0	0							
ALT PROV	1W O	HWHNCT02B11	3430		100	0	0	100	3430							

Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc Clec to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc Clec to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRI003GT		PRVDRI003GT	XX	100	XX	XX	XX	XX	1						35784	29820
911		PRVDRI003GT	XX	100	XX	XX	XX	XX	1							
MF 2W		PRVDRI003GT	3455	60	3450	3450	60	3450	5							
SS7 2W		PRVDRI003GT	6200	60	6200	6200	60	6200	9							
SS7 1W I		PRVDRI003GT	0	0	50400	50400	0	0	40							
SS7 1W O		PRVDRI003GT	50400	100	50400	50400	100	50400	40	4			24 inst			
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX	1							
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX	1							
ALT PROV	1W I	HWHNCT02B1I	0	0	3640	3640	0	0	4							
ALT PROV	1W O	HWHNCT02B1I	3640	100	0	0	100	3640	4	1			24 inst			



Lata \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

Company \_\_\_\_\_ Brooks Fiber Properties

Clec Forecast for the period (QYYY) \_\_\_\_\_ to \_\_\_\_\_

State \_\_\_\_\_

Wire Ctr.	CLLI	Serving Tandem CLLI	Minutes of use EO Orig	Percent Tfc to NYNEX	Minutes of use EO Term	Minutes of use TDM Orig	Percent Tfc to Nynex	Minutes of use Tdm Term	IOF DS1 Tdm EO	IOF DS3 Tdm EO	IOF DS1 POP TDM EO	IOF DS3 POP TDM EO	NYNEX Cages Eqpt DS3	Facs Cbl NYNEX Cages	Number Port Qty of Port #s	Loop Plant QTY SVGALS
PRVDRICEDS0		PRVDRI003GT														
	911	PRVDRI003GT	XX	100	XX	XX	XX	XX		1						
	911	PRVDRI003GT	XX	100	XX	XX	XX	XX		1						
	MF 2W	PRVDRI003GT	3840	60	3840	3840	60	3840		6						
	SS7 2W	PRVDRI003GT	6600	60	6600	6600	60	6600		9						
	SS7 1W I	PRVDRI003GT	0	0	52800	52800	0	0		42						
	SS7 1W O	PRVDRI003GT	52800	100	0	0	100	52800		42	4			24 inst		
ALT PROV	SS7	NWHNCT0304	XX	XX	XX	XX	XX	XX		1						
ALT PROV	SS7	WTRBCT0002	XX	XX	XX	XX	XX	XX		1						
ALT PROV	1W I	HWHNCT02B1t	0	0	3950	3950	0	0		4						
ALT PROV	1W O	HWHNCT02B1t	3950	100	0	0	100	3950		4	1			24 inst		